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August 30, 2013

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RWQCB-CVR
FRESNO, CALIF.

Denise Soria, MSCE
Water Resources Control Engineer
Regional Water Quality Control Board
Central Valley Region
1685 E. Street
Fresno, CA 93706

re: Tentative Waste Discharge Requirements for Olam, Firebaugh, CA

Dear Denise,

We have completed our review of the tentative Waste Discharge Requirements for the Olam West Coast Inc. (Olam) facility at 47641 W. Nees Ave., Firebaugh, CA. With the exception of the Company's questions noted below, Olam West Coast Inc. is in agreement with the tentative Waste Discharge Requirements Order R5-2013-_____.

The specific sections or the WDR that the Company has questions about or needs further clarification about include: (1) on page 2, paragraph 6: the 2,500 gallon holding tank is actually a 5,000 gallon tank; and the paragraph mentions wastewater is **treated** in two unlined aeration ponds. As we understand it, treated is noted because of the Company's aeration of the ponds. There is no other treatment of the waste water; (2) on page 2, paragraph 7 it says "silt is applied to the LAA". We estimate that there is approximately 120 cubic yards, or 162 tons of silt excavated from the settling pond each year. Limiting our use of this material to applying it only to the LAA could potentially affect the crop grown on the disposal fields over time. Consequently, we would like the option to dispose of it as fill material for local farmers which has been an historical use of the material; (3) on page 2 of the Monitoring and Reporting Program Order R5-2013__, under Pond Monitoring, it specifies a bound logbook. We request that this be changed to any permanent method of recordkeeping, including electronic; (4) on page 2 of the Monitoring and Reporting Program Order R5-2013__, under Tile Drainage Monitoring, it specifies that the company monitor the DP-31, DP-40 and DP-41 tile drainage sumps. The Company has an issue with the monitoring requirement for DP-40 and DP-41 because water flow is to the northeast, which is covered by DP-31 and because the company has no ownership or control over DP-40 and DP-41.

If there any are questions or if additional information is needed please contact me at my contact information below or Rick Harker at rick.harker@olamnet.com.

Sincerely,

Chris Bennett
Chris.bennett@olamnet.com
209-364-2065